



"6. The "source and object code" comprised within the CPS system and that of "any application called by the Child Protection System when executing" requested by the Federal Public Defender's office is extremely voluminous. At more than 4.7 million lines of code, it would be difficult for TLO to compile and virtually impossible for receiving parties to review prior to trial. This line count does not include source code for the proprietary database storage system designed by TLO.

"7. In addition to the programming code, the data accessed by the CPS system is also voluminous and extremely sensitive. The criminal lead data alone is in excess of ten billion records since collection began at TLO in 2009. There are currently more than 15 thousand active criminal investigations identified in CPS by investigators from around the world. Providing this information would not only compromise those investigations, but would also undermine CPS as an investigative tool for law enforcement.

I declare under criminal penalty of perjury that the foregoing is true and correct.

FURTHER SAYETH AFFIANT NOT.


DATED this 3<sup>rd</sup> day of June, 2013.

  
WILLIAM S. WILTSE

I, Lynn Dallmer, a Notary Public of the County and State aforesaid, hereby certify that William S. Wiltse personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

Witness my hand and official seal this the 3<sup>rd</sup> day of June, 2013.

My Commission expires  
  
/

  
Notary Public